

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

WILLIAM DAVIS &)
LINDA DAVIS,)
)
PLAINTIFFS,)
)
vs.) CASE NUMBER: 1:07-cv-215
)
ARROW FINANCIAL SERVICES, LLC.,)
)
DEFENDANT.)

MOTION FOR EXTENSION OF TIME TO RESPOND

COMES NOW the Plaintiffs, by and through their undersigned counsel, and hereby prays this Honorable Court to grant the Defendant an extension of time to notice their appearance and file an answer to Plaintiffs' Complaint. In support of said request, Plaintiffs would proffer that counsel has been in contact with in-house corporate counsel of the Defendant. The parties are attempting to negotiate a compromise of this matter before Defendant retains local counsel to answer Plaintiffs' Complaint. Counsel for Plaintiffs have agreed not to seek a Default Judgment while said negotiations are taking place.

WHEREAS, the premises considered, the Plaintiffs hereby prays this Honorable Court to allow the Defendant an appropriate extension of time to allow the parties to fully explore settlement negotiations at this juncture.

BROCK & STOUT

/s/ Gary W. Stout
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CERTIFICATE OF SERVICE

Gary W. Stout, Esq., attorney for Plaintiff, hereby certifies to the Court as follows:

1. I am not a party for the foregoing proceeding;
2. I am not less than 18 years of age;
3. I have this day served a copy of the foregoing on all parties in interest by placing the same in an envelope, first-class mail, postage prepaid, and addressed to each person at his dwelling house or usual place of abode or to the place where he or she regularly conducts his business or profession as follows:

Arrow Financial Services, LLC, Paul C. Ziebert, Esquire, 5996 West Touhy Avenue, Niles, IL 60714;

And by Electronic Notification to:

Paul C. Ziebert, Esquire, pziebert@arrowfinancial.com,

4. To the best of my knowledge, information and belief, the parties in interest are not infants or incompetent persons;
5. Service as outlined herein was made within the United States of America.

Dated this the 3RD day of May, 2007.

BROCK & STOUT

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